

Exhibit Q

1

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 COUNTY OF ALAMEDA

3 HON. RICHARD SEABOLT, JUDGE

4

5 ANTHONY HERNANDEZ VALADEZ ,

6 Plaintiff ,

7 vs .

Case No. 22CV012759

8 JOHNSON & JOHNSON, et al. ,

9 Defendants .

10 _____/

11

12

13

14

15 Reporter's Transcript of Remote Proceedings

16 Wednesday, March 15, 2023

17

18

19

20

21

22

23

24

25

Reported By: Sheila Pham, CSR No. 13293

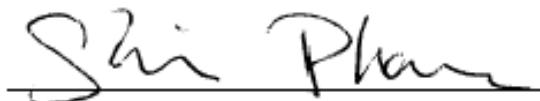
1 jury can't hear from.

2 Dr. Longo testified that he photographs -- he
3 photographs and produces the photographs of all of the
4 slides. I don't know if these slides still exist.

5 And by the way, at no point in time -- they do
6 degrade quickly over time. I don't know how quickly off
7 the top of my head. But at no point in time in the six
8 years of litigation has J&J ever sought this relief in
9 any other case, and they've had more than, you know,
10 cross-examination of Dr. Longo.

11 So this is a new request for the first time in
12 this case that I've never heard of before, and I don't
13 know the specifics. I just got a response about an hour
14 before our hearing started, a detailed response. And so
15 I haven't had a chance to talk to Dr. Longo and to have
16 further meet and confer on this issue.

17 With regards to the samples, this is a sample
18 -- they claimed to take the product off the market, the
19 talc product, during COVID, May of 2020. Well, in the
20 fall of 2022, we found near Mr. Valadez's house at the
21 hotel where his deposition was, actually, this filled
22 Johnson & Johnson product. Not only was it filled, it
23 was wrapped in plastic in a box, Johnson & Johnson. So
24 two and a half years after they claimed to quit making
25 this product, it's on the marketplace.

1 REPORTER'S CERTIFICATION
23 I, Sheila Pham, a Certified Shorthand Reporter, do
4 hereby certify:5 That the foregoing proceedings were taken before me
6 at the time and place therein set forth, that the
7 proceedings were reported stenographically by me and
8 were thereafter transcribed under my direction and
9 supervision, and that the foregoing pages contain a
10 full, true and accurate record of all proceedings and
11 testimony to the best of my skill and ability.12 In witness whereof, I have subscribed my name.
1314
15 Dated: 3/20/2023
16
1718 
1920 Sheila Pham
2122 CSR No. 13293
23

24

25